

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA :

- v. - :

SHAH WALI IBRAHIMI,
a/k/a "Wali," :

INDICTMENT

21 Cr. _____

Defendant. :

- - - - - x

22 CRIM 004

COUNT ONE

(Conspiracy to Import Heroin)

The Grand Jury charges:

1. From at least in or about April 2021, up to and including in or about October 2021, in Pakistan and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district of the United States, SHAH WALI IBRAHIMI, a/k/a "Wali," the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, intentionally and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that SHAH WALI IBRAHIMI, a/k/a "Wali," the defendant, and others known and unknown, would and did import into the United States and into

the customs territory of the United States from a place outside thereof a controlled substance, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and an object of the conspiracy that SHAH WALI IBRAHIMI, a/k/a "Wali," the defendant, and others known and unknown, would and did manufacture, possess with intent to distribute, and distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substance that SHAH WALI IBRAHIMI, a/k/a "Wali," the defendant, conspired to (a) import into the United States and into the customs territory of the United States from a place outside thereof, and (b) manufacture, possess with intent to distribute, and distribute, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, was one kilogram and more of mixtures and substances containing a

detectable amount of heroin, in violation of Title 21, United States Code, Section 960(b)(1)(A).

(Title 21, United States Code, Section 963; Title 18, United States Code, Section 3238.)

COUNT TWO

(Conspiracy to Commit Money Laundering)

The Grand Jury further charges:

5. From at least in or about August 2021, up to and including in or about October 2021, in Pakistan, the Southern District of New York, and elsewhere, and in an offense begun out of the jurisdiction of any particular State or district, SHAH WALI IBRAHIMI, a/k/a "Wali," the defendant, and others known and unknown, at least one of whom is expected to be first brought to and arrested in the Southern District of New York, intentionally and knowingly, did combine, conspire, confederate, and agree together and with each other to commit a money laundering offense in violation of Title 18, United States Code, Section 1956.

6. It was a part and an object of the conspiracy that SHAH WALI IBRAHIMI, a/k/a "Wali," the defendant, and others known and unknown, would and did transport, transmit, and transfer, and attempt to transport, transmit, and transfer a monetary instrument and funds from a place in the United States to and through a place outside the United States, and to a place in the United States from and through a place outside the United States, and attempted

to do the same, with the intent to promote the carrying on of specified unlawful activity -- to wit, the conspiracy charged in Count One of this Indictment to (a) import into the United States and into the customs territory of the United States from a place outside thereof a controlled substance, and to (b) manufacture, possess with intent to distribute, and distribute a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States -- in violation of Title 18, United States Code, Section 1956(a)(2)(A).

(Title 18, United States Code, Sections 1956(h), 1956(i), and 3238.)

FORFEITURE ALLEGATIONS

9. As a result of committing the controlled substance offense alleged in Count One of this Indictment, SHAH WALI IBRAHIMI, a/k/a "Wali," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of said offenses and any and all property used or intended to be used in any manner or part to commit or to facilitate the commission of said offenses, including but not limited to a sum of money in United States

currency representing the amount of proceeds traceable to the commission of said offense.

10. As a result of committing the offense alleged in Count Two of this Indictment, SHAH WALI IBRAHIMI, a/k/a "Wali," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Assets Provision

12. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Sections 853 and 970; and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

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Defendant.

INDICTMENT

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(21 U.S.C. §§ 959, 963; and
18 U.S.C. § 1956.)

DAMIAN WILLIAMS

United States Attorney.

A TRUE BILL


Foreperson.

1/3/22
Filed Indictment
Case assigned to Judge Cote

CSAT Lehigh

etc